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January 31, 1997

JAN 31 1997

BY HAND DELIVERY

Mr. William F. Caton

Acting Secretary

Federal Communications Commission

1919 M Street, N.W., Room 222

Washington, D.C. 20554

Re: Advanced Television Systems and Their Impact upon the
Existing Television Broadcast Service (MM Docket 87-268)

Dear Mr. Caton:

Transmitted herewith, on behalf of White Knight Broadcasting, Inc., are an original and four copies of its "Reply Comments" in connection with the above-captioned proceeding.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

Vincent J. Curtis, Jr.

Counsel for White Knight Broadcasting, Inc.

VJC:mah

Enclosure

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ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)
)
Advanced Television Systems and Their)
Impact upon the Existing Television)
Broadcast Service)

MM Docket No. 87-268

JAN 31 1997

To: The Commission

REPLY COMMENTS OF
WHITE KNIGHT BROADCASTING, INC.

Comes now White Knight Broadcasting, Inc. ("White Knight"),¹ by its attorneys, and hereby submits its Reply Comments to the Commission's Sixth Further Notice of Proposed Rule Making in this proceeding, 11 FCC Rcd 10968 (1996).² In support, the following is stated:

1. The Sinclair/Broadcast Caucus agreement, which is set forth in the Reply Comments filed separately by each party, provides the opportunity for UHF stations to operate in the DTV environment with a power level consistent with relative competitive positions *vis a vis* existing VHF stations. Under the original proposals of both the Broadcast Caucus, which submitted its Comments in response to the Sixth Further Notice, as well as the Commission's table released for Comment,

¹White Knight, through wholly owned subsidiaries, controls Stations WLVA(TV), Baton Rouge, KSHV(TV), Shreveport, both Louisiana, and KAKW(TV), Killeen, Texas.

²Although the Commission has established January 24, 1997 as the extended reply date, as reported in the trade press (See Communications Daily, Tuesday, January 28, 1997, "Broadcasters Reach Agreement on Most DTV Power Issues"), a major agreement was reached by Sinclair Broadcasting and other UHF licensees with the Broadcast Caucus, backed by MSTV, which would dramatically alter the power levels of the DTV channels for existing UHF stations, if adopted by the Commission. Because of the substantial effect that this agreement would have on all UHF stations, which proposal was not previously available for comment, it is submitted that good cause exists for accepting these Comments at this time.

the emphasis was solely upon a replication of coverage. While commendable, that theory ignored the competition aspect requiring sufficient power to participate as a real player in the market.

2. White Knight supports the terms of the agreement reached by Sinclair and the Broadcast Caucus and urges the Commission to adopt their plan for transition purposes. The plan provides for a reasonable approach based upon empirical studies for determining power levels that protect existing UHF stations in the DTV era. Without such protection, existing UHF stations are condemned to be second-rate citizens in the DTV world and destined for failure.³

WHEREFORE, the Premises considered, it is respectfully requested that the Commission accept these Reply Comments and adopt the positions set forth herein.

Respectfully submitted,

WHITE KNIGHT BROADCASTING, INC.

By: 

Vincent J. Curtis, Jr.

Its Attorney

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January 31, 1997

³White Knight does not agree with the Broadcast Caucus's position on delaying decisions on these problem changes in the FCC/Broadcast Caucus proposals submitted by specific licensees. Not to treat these concerns -- which have been documented as substantial problems -- would be basically unfair and contrary to the public interest duty of the Commission.

CERTIFICATE OF SERVICE

I, Mary A. Haller, a secretary in the firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that true copies of the foregoing "Reply Comments of Communications Corporation of America" were sent this 31st day of January, 1997, by first-class United States mail, postage prepaid, to the following:

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